

EXHIBIT B

BOIES SCHILLER FLEXNER LLP

David Boies (*pro hac vice*)
333 Main Street
Armonk, NY 10504
(914) 749-8200
dboies@bsfllp.com

Maxwell V. Pritt (SBN 253155)
Joshua M. Stein (SBN 298856)
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
(415) 293-6800
mpritt@bsfllp.com
jstein@bsfllp.com

Jesse Panuccio (*pro hac vice*)
Jay Schuffenhauer (*pro hac vice*)
1401 New York Ave, NW
Washington, DC 20005
(202) 237-2727
jpanuccio@bsfllp.com
jschuffenhauer@bsfllp.com

Joshua I. Schiller (SBN 330653)
David L. Simons (*pro hac vice*)
55 Hudson Yards, 20th Floor
New York, NY 10001
(914) 749-8200
jischiller@bsfllp.com
dsimons@bsfllp.com

*Interim Lead Counsel for Individual and Representative
Plaintiffs and the Proposed Class*

[Additional counsel included below]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

Individual and Representative Plaintiffs,

v.

Meta Platforms, Inc.,

Defendant.

Case No. 3:23-cv-03417-VC

**PLAINTIFFS' SEVENTH SET OF
REQUESTS FOR PRODUCTION TO
DEFENDANT META PLATFORMS, INC.**

1 In accordance with Federal Rules of Civil Procedure 26 and 34, and orders issued by the Court in
 2 this matter, Plaintiffs, by and through their undersigned attorneys, request that Meta produce for inspection
 3 and copying, by **March 19, 2025**, the documents and things described below, in accordance with the
 4 following definitions and instructions. Meta must produce documents and other things described below
 5 electronically or at the offices of Boies Schiller Flexner, LLP, 44 Montgomery St., 41st Fl., San Francisco,
 6 CA 94104.

7 **DEFINITIONS**

8 As used herein, the following words, terms, and phrases—whether singular or plural, or in an
 9 alternate verb tense—shall have the meanings ascribed below. Defined terms may not be capitalized or
 10 made uppercase. The given definitions apply regardless of whether a term in question is capitalized or made
 11 uppercase. No waiver of a definition is implied by the use of a defined term in a non-capitalized or lowercase
 12 form:

13 1. “Any,” “or,” and “and”: “Any” should be understood to include and encompass “all”; “or”
 14 should be understood to include and encompass “and”; and “and” should be understood to include and
 15 encompass “or.”

16 2. “Data” means content, files, information, metadata, software, or any other digital material,
 17 including Documents.

18 3. “Document” is used in its broadest sense allowed by Federal Rule of Civil Procedure 34(a),
 19 and includes:

- 20 • All application logs, command-line history logs (including the .bash_history file in the user
 21 home directories of servers used for downloading data), download logs, data processing
 22 records, usage reports, server logs, network traffic reflecting torrent downloads or uploads
 23 (including during the leeching and seeding phases), and descriptor files; and
- 24 • All data acquired via torrent clients copied to any data storage solution such as local servers,
 25 virtual servers, cloud-based storage, including Amazon Web Services S3 synchronization
 26 logs, data integrity checks, and access control records.

1 any lost or destroyed Document; (5) all document retention and destruction policies in effect at the time any
2 requested Document was destroyed; and (6) all efforts made to locate any responsive Document that was
3 lost or destroyed.

4 3. If You object to any item or category of item, Your response shall (a) identify with
5 particularity each document or thing to which the objection is made and (b) set forth clearly the extent of,
6 and specific ground for, the objection; and You should respond to the Request to the extent it is not
7 objectionable.

8 4. If You object that a Document is covered by the attorney-client or other privilege, or is work-
9 product, You must provide a Privilege Log containing: (1) the name of the Document; (2) the name and
10 address of the person(s) who prepared it; (3) the person(s) to whom it was directed or circulated; (4) the date
11 on which the Document was prepared or transmitted; (5) the name and address of the person(s) now in
12 possession of the Document; (6) the description of the subject matter of the Document; (7) the filename or
13 pathname of the Document; and (8) the specific nature of the privilege claimed, including the reasons and
14 each and every fact supporting the withholding, and legal basis sufficient to determine whether the claim of
15 privilege is valid.

16 **REQUEST FOR PRODUCTION OF DOCUMENTS**

17 **REQUEST FOR PRODUCTION NO. 137**

18 Documents sufficient to show the installation, usage, configuration, and operation of Torrent Clients
19 to obtain Data from Online Databases, including the filename, size, file creation time, and file last modified
20 date of the Data; configuration files or equivalent settings registries, bandwidth logs, work files, and support
21 tickets; and Amazon Web Services invoices relating to Your data usage, storage, or transfer.
22
23
24
25
26
27
28

Dated: March 5, 2025

By: /s/ Maxwell V. Pritt
Maxwell V. Pritt

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

Elizabeth J. Cabraser (SBN 083151)
Daniel M. Hutchinson (SBN 239458)
Reilly T. Stoler (SBN 310761)
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
(415) 956-1000
ecabraser@lchb.com
dhutchinson@lchb.com
rstoler@lchb.com

Rachel Geman (*pro hac vice*)
250 Hudson Street, 8th Floor
New York, NY 10013
(212) 355-9500
rgeman@lchb.com

Kenneth S. Byrd (*pro hac vice*)
Betsy A. Sugar (*pro hac vice*)
222 2nd Avenue South, Suite 1640
Nashville, TN 37201
(615) 313-9000
kbyrd@lchb.com
bsugar@lchb.com

JOSEPH SAVERI LAW FIRM, LLP

Joseph R. Saveri (SBN 130064)
Cadio Zirpoli (SBN 179108)
Christopher K.L. Young (SBN 318371)
Margaux Poueymirou (SBN 356000)
Holden Benon (SBN 325847)
Aaron Cera (SBN 351163)
601 California Street, Suite 1505
San Francisco, California 94108
(415) 500-6800
jsaveri@saverilawfirm.com
czirpoli@saverilawfirm.com
cyoung@saverilawfirm.com
mpoueymirou@saverilawfirm.com
hbenon@saverilawfirm.com
acera@saverilawfirm.com

BOIES SCHILLER FLEXNER LLP

David Boies (*pro hac vice*)
333 Main Street
Armonk, NY 10504
(914) 749-8200
dboies@bsfllp.com

Maxwell V. Pritt (SBN 253155)
Joshua M. Stein (SBN 298856)
44 Montgomery Street, 41st Floor
San Francisco, CA 94104
(415) 293-6800
mpritt@bsfllp.com
jstein@bsfllp.com

Jesse Panuccio (*pro hac vice*)
Jay Schuffenhauer (*pro hac vice*)
1401 New York Ave, NW
Washington, DC 20005
(202) 237-2727
jpanuccio@bsfllp.com
jschuffenhauer@bsfllp.com

Joshua I. Schiller (SBN 330653)
David L. Simons (*pro hac vice*)
55 Hudson Yards, 20th Floor
New York, NY 10001
(914) 749-8200
jischiller@bsfllp.com
dsimons@bsfllp.com

Interim Lead Counsel for Individual and Representative Plaintiffs and the Proposed Class

1 Matthew Butterick (SBN 250953)
2 1920 Hillhurst Avenue, #406
3 Los Angeles, CA 90027
4 (323) 968-2632
5 mb@buttericklaw.com

6 **CAFFERTY CLOBES MERIWETHER &**
7 **SPRENGEL LLP**

8 Bryan L. Clobes (*pro hac vice*)
9 135 S. LaSalle Street, Suite 3210
10 Chicago, IL 60603
11 (312) 782-4880
12 bclobes@caffertyclobes.com

13 **DICELLO LEVITT LLP**

14 Amy Keller (*pro hac vice*)
15 Nada Djordjevic (*pro hac vice*)
16 James Ulwick (*pro hac vice*)
17 10 North Dearborn Street, Sixth Floor
18 Chicago, Illinois 60602
19 (312) 214-7900
20 akeller@dicellolevitt.com
21 ndjordjevic@dicellolevitt.com
22 julwick@dicellolevitt.com

23 David Straite (*pro hac vice*)
24 485 Lexington Avenue, Suite 1001
25 New York, New York 10017
26 (646) 933-1000
27 dsraite@dicellolevitt.com

28 **COWAN DEBAETS ABRAHAMS &**
SHEPPARD LLP

Scott J. Sholder (*pro hac vice*)
CeCe M. Cole (*pro hac vice*)
60 Broad Street, 30th Floor
New York, NY 10004
(212) 974-7474
ssholder@cdas.com
ccole@cdas.com

*Counsel for Individual and Representative
Plaintiffs and the Proposed Class*